

EXHIBIT 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF ANGELA L. PADILLA, ESQ.

San Francisco, California

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Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

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1 subject? 10:34:28

2 A Truly, I do not. 10:34:29

3 Q So you can't testify as to what sources 10:34:45

4 within Uber were searched or not searched in -- to 10:34:47

5 comply with the court's order; is that right? 10:34:55

6 A I don't know if that impinges on privilege 10:35:03

7 or not. 10:35:05

8 Q Okay. What sources did Uber search within 10:35:05

9 Uber to comply with the court's order? 10:35:11

10 A As far as I recall, everywhere. Meaning 10:35:16

11 we took this order very, very seriously and put a 10:35:21

12 ton of people power on the direction here in 10:35:28

13 paragraph 4. 10:35:34

14 And I believe we also retained outside 10:35:36

15 experts to help us and moved heaven and earth to 10:35:38

16 look under every rock and understand the answer to 10:35:46

17 paragraph 4. 10:35:50

18 Q Okay. So who did -- who did you retain? 10:35:53

19 A I don't recall the name of the forensic 10:35:59

20 expert that was retained. 10:36:01

21 Q Do you recall the -- the entity? 10:36:02

22 A Hum-um. I don't. I'm sorry. 10:36:04

23 Q Do you know what specifically that entity 10:36:06

24 did to search within Uber? 10:36:10

25 A I'm sure -- sorry. Is your question done? 10:36:16

1 to mind right now. 10:38:15

2 Q (BY MR. PERLSON) Okay. 10:38:16

3 A And speak to the individuals named here, 10:38:17

4 Anthony, Sameer, Radu. 10:38:19

5 The idea was to -- to leave no stone 10:38:24

6 unturned. The idea was scorched-earth approach. 10:38:26

7 Q But you didn't search everywhere -- Uber 10:38:34

8 didn't search everywhere within -- let me start over 10:38:37

9 again. 10:38:41

10 Uber did not search every electronic 10:38:42

11 source of data within Uber in response to the 10:38:44

12 court's March 16 order? Would you agree with that? 10:38:53

13 A I don't have a basis to agree or not 10:38:59

14 agree. I'm sure that what we searched was based on 10:39:01

15 identifying the most likely places where any of this 10:39:06

16 information would -- would be found, if it was there 10:39:13

17 at all. 10:39:16

18 Q Okay. What areas were searched 10:39:17

19 specifically? 10:39:19

20 A For that, you would have to ask others on 10:39:20

21 the team or outside counsel and the vendor that 10:39:22

22 helped us. 10:39:26

23 Q Okay. You don't -- you don't know that -- 10:39:28

24 you don't have any personal knowledge of that 10:39:30

25 yourself? 10:39:32

1	A	I really don't.	10:39:33
2	Q	Okay. And so you don't know specifically	10:39:33
3		what outside counsel did in terms of trying to	10:39:37
4		obtain -- obtain any information responsive to	10:39:44
5		paragraph 4 of the March 16 order; is that fair?	10:39:48
6	A	I mean, that's fair to say. I know in	10:39:52
7		general how one would search for this kind of	10:39:54
8		information, but I don't know specifically what they	10:39:57
9		did.	10:40:01
10	Q	Okay. And as to the in-house counsel that	10:40:01
11		was tasked to assist with Uber's response to	10:40:08
12		paragraph 4 of the court's March 16 order, you don't	10:40:12
13		know specifically what -- what they did; is that	10:40:16
14		fair?	10:40:20
15	A	I know they spent a ton of time over at	10:40:20
16		Otto in trying to find any of this information, if	10:40:24
17		any of it existed, and interviewing people and	10:40:28
18		reviewing forensic material that had been acquired.	10:40:33
19		But -- but in terms of telling you detail	10:40:37
20		by detail, no, I can't do that.	10:40:39
21	Q	Okay. And -- and how did you know that	10:40:42
22		the -- that your in-house team was -- was doing	10:40:43
23		investigations or talking to people at Ottomotto?	10:40:52
24	A	I was told so.	10:40:56
25	Q	Okay. By your in-house --	10:40:57